

Jason A. Geller (CA SBN 168149)  
E-Mail: [jgeller@fisherphillips.com](mailto:jgeller@fisherphillips.com)  
Juan C. Araneda (CA SBN 213041)  
E-Mail: [jaraneda@fisherphillips.com](mailto:jaraneda@fisherphillips.com)  
FISHER & PHILLIPS LLP  
One Montgomery Street, Suite 3400  
San Francisco, California 94104  
Telephone: (415) 490-9000  
Facsimile: (415) 490-9001

Attorneys for Defendant  
WALMART INC.

William D. Hendricks (CA SBN 221071)  
E-Mail: [whendricks@wdhlegal.com](mailto:whendricks@wdhlegal.com)  
LAW OFFICES OF WILLIAM D. HENDRICKS  
20350 Ventura Boulevard, Suite 100  
Woodland Hills, CA 91364  
Telephone: (818) 961-9000  
Facsimile: (888) 636-2420

Attorneys for Plaintiff  
CANDIDA TELLEZ DE QUINONEZ

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

CANDIDA TELLEZ DE QUINONEZ, an  
individual,

Plaintiff,

v.

WALMART, INC., PETER DANOFF, an  
individual, MARIA IBARRA, an individual,  
and DOES 1 - 50, inclusive,

Defendants.

CASE NO.: 2:23-CV-01753- TLN-JDP

*[Removed from Solano County Superior Court,  
Case No. CU23-01511]*

**JOINT STIPULATION TO CONTINUE  
DISCOVERY DEADLINES; ORDER  
THEREON**

Removal Filed: August 18, 2023  
Complaint Filed: May 19, 2023  
Trial Date: Not set

Plaintiff CANDIDA TELLEZ DE QUINONEZ (“Plaintiff”) and Defendant WALMART INC. (“Defendant”), by and through their counsel of record, hereby jointly stipulate and respectfully request that the Court continue the discovery deadlines established by the Court’s Initial Pretrial Scheduling Order (ECF No. 7) (the “Order”).

WHEREAS, Plaintiff has been searching for but has not found new counsel to substitute into this matter to represent her;

WHEREAS, the parties agree to extend the discovery deadlines, as set forth below, to allow Plaintiff time to seek counsel and to avoid prejudice to the parties to conduct discovery once Plaintiff’s new counsel substitutes in;

WHEREAS, the parties have not previously requested to extend the deadlines in the Order; and

WHEREAS, such extension will have no effect on the trial date in this case.

IT IS THEREFORE JOINTLY STIPULATED AND AGREED, by and between the Parties through their respective counsel of record, that the dates set forth in the Court’s Order should be changed to the following dates:

Discovery	Current Date/Deadline	Proposed New Date
Close of Non-expert Discovery	April 15, 2024	<b>July 12, 2024</b>
Disclosure of Expert Witnesses	June 14, 2024	<b>August 16, 2024</b>
Supplemental List of Expert Witnesses	July 15, 2024	<b>September 13, 2024</b>
Supplemental Discovery Cutoff	September 11, 2024	<b>October 11, 2024</b>

IT IS SO STIPULATED.

DATE: March 18, 2024

FISHER & PHILLIPS LLP

By: */s/ Juan C. Araneda*  
Juan C. Araneda  
Attorneys for Defendant  
WALMART INC.

1 DATE:

LAW OFFICES OF WILLIAM D. HENDRICKS

2  
3 By: /s/

William D. Hendricks

Attorneys for Plaintiff

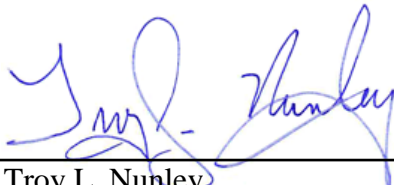
4 CANDIDA TELLEZ DE QUINONEZ

5  
6 **ORDER**

7 The Court hereby adopts the parties' stipulation set forth above.

8 IT IS SO ORDERED.

9 DATED: March 18, 2024

10  
11   
12 \_\_\_\_\_

Troy L. Nunley  
United States District Judge